

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Case No. 10-10050 (MG)

SAUNDRA PLUMERI,

Chapter 13

Debtor.

NOTICE OF CROSS MOTION

PLEASE TAKE NOTICE THAT upon the annexed Declaration of **RICHARD D LAMBORN**, Esq., attorney for Debtor, affirmed February 4, 2010, and upon all of the pleadings and proceedings heretofore had herein, the undersigned will move the above entitled Court, to be held in and for the Southern District of New York, at the Courthouse at

LOCATION: One Bowling Green, Courtroom 501, New York, NY 10007

DATE: February 11, 2010

TIME: At 10:00 A.M. in the forenoon of that day or as soon thereafter as counsel can be heard

FOR AN ORDER:

1. Quashing service of Creditor's, 64th Street Third Avenue Associates, LLC,'s Motion to Vacate Stay and to Dismiss
2. Requiring Creditor to mail a hard copy of said Motion to Debtor's attorney due to excessive length,
3. Adjourning the return date for said Motion, and

3. For such other and further relief as the Court may deem just and proper.

Dated: 2/4/10

/s/ Richard D Lamborn

RICHARD D LAMBORN, Esq.

Attorney for Debtor

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